

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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<i>In the Matter of</i>)	
)	
The 4.9 GHz Band Transfer from)	WT Docket 00-32
Federal Government Use)	
)	
)	

COMMENTS OF CISCO SYSTEMS, INC.

Cisco Systems, Inc., (“Cisco”) hereby submits comments in support of the Petition filed by the National Public Telecommunications Council to Reconsider the Commissions Memorandum Opinion and Report and Third Report and Order in the above proceeding.

Cisco specifically supports the comments filed under Section II of the referenced filing that addresses the emission mask. As one of the leading manufacturers of 802.11 based equipment, we believe the modification of the emission mask to include OFDM modulation will allow the 802.11 manufacturers to provide low cost, high data rate systems to the Public Safety community.

A number of Public Safety Services have been begun deploying cost effective 802.11 equipment operating in the 2.4 and 5 GHz bands to provide high speed data and video connections for remote and mobile sites. However these systems operate on a license exempt basis and are subject to operating constraints under Part 15 including accepting interference. This significantly impacts the operation of these systems for Public Safety Services in critical deployments.

Cisco believes that by modifying the emission mask as suggested in the referenced petition would not only allow the Public Safety Services to operate 802.11 type equipment to provide high speed data connection in this band but will also allow the systems to operate under Part 90 of the rules thus providing the needed protection for these systems that are providing critical safety communications.

Cisco urges the Commission to review the petition filed by the National Public Safety Telecommunication Council and adopt the proposed change to the emission mask to allow the acceptance of the OFDM emission mask, thus allowing 802.11 type operations in the 4940-4990 MHz band.

Respectfully submitted,

CISCO SYSTEMS, INC.

By: David A. Case NCE, NCT
Cisco Systems, Inc.
Corporate Compliance
EMC Standards and Operations Group
Stonegate Corp Park
4125 Highlander Parkway
Richfield OH 44286
(330) 523-2139